

*Jonathan Silver*

*Attorney at Law*

—  
*of Counsel*

*Stephen T. Fein*

*Jennifer Beinert*

*Paul G. Kerson*

*Crossroad Tower*

*80-02 New Gardens Road, Suite #316, New Gardens, NY. 11415*

*(718) 520-1010*

*Fax No. (718) 575-9842*

*juanplata@aol.com*

November 9, 2020

Hon. Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Jagdev and Kuldeep Singh v. Singh et al  
19 CV 6927

Dear Judge Cogan:

I am writing as the attorney for the plaintiffs in the above entitled action.

I am making this application for a pre-motion conference for the purpose of seeking leave to move to withdraw as the attorney of record for the plaintiffs.

The motion would be based on certain communications and documents provided by my clients that greatly impact the claims made for them by this office and the representations made by this office on their behalf to counsel and the Court. This has created certain fundamental differences with the clients about how to proceed.

On this basis I do not see how and by what means I can effectively represent them in this matter any further.

Defendants' counsel has submitted to the Court a request for a pre-motion Conference concerning discovery issues as well as recitation of the present status of discovery and what issues remain outstanding.

I would respectfully request those issues be held in abeyance pending this application.

Respectfully submitted,

JONATHAN SILVER

JS/eb